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*Attorney for Plaintiff, U.S. Bank, National Association, Successor Trustee To Bank Of America, N.A., As Successor Trustee To LaSalle Bank, N.A, As Trustee For The Holders Of The First Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-FF1*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

U.S. BANK, NATIONAL ASSOCIATION,  
SUCCESSOR TRUSTEE TO BANK OF  
AMERICA, N.A., AS SUCCESSOR  
TRUSTEE TO LASALLE BANK, N.A, AS  
TRUSTEE FOR THE HOLDERS OF THE  
FIRST FRANKLIN MORTGAGE LOAN  
TRUST, MORTGAGE LOAN ASSET-  
BACKED CERTIFICATES, SERIES 2007-  
FF1,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE  
INSURANCE COMPANY and LAWYERS  
TITLE INSURANCE CORPORATION,

Defendants.

Case No.: 2:19-cv-00809-GMN-BNW

**STIPULATION TO EXTEND TIME TO  
RESPOND TO MOTION TO DISMISS  
[ECF NO. 53]**

**(First Request)**

COMES NOW, Plaintiff, U.S. Bank, National Association, Successor Trustee To Bank Of America, N.A., As Successor Trustee To LaSalle Bank, N.A, As Trustee For The Holders Of The First Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-FF1 (“US Bank”) and Defendant, Fidelity National Title Insurance Company (“Fidelity”, collectively, the “Parties”), by and through their respective undersigned counsels, stipulate and agree as follows:

1. On March 12, 2024, Fidelity filed a Motion to Dismiss [ECF Nos. 53];
2. US Bank's deadline to respond to Fidelity's Motion to Dismiss is currently March 26, 2024;
3. This is one of five cases pending before this Court in which similar Motions to Dismiss have been filed and with the same deadline for a response<sup>1</sup>. Good cause exists for a brief extension as counsel for US Bank reasonably requires additional time to diligently prepare responses given the numerous Motions to Dismiss due at the same time. US Bank requests a two-week extension up to and including April 9, 2024 to file its response to Fidelity's Motion to Dismiss;
4. Counsel for Fidelity does not oppose the requested extension;
5. This is the first request for an extension and is made in good faith and not for purposes of undue delay or prejudice.

**IT IS SO STIPULATED.**

DATED this 25<sup>th</sup> day of March, 2024.

WRIGHT, FINLAY & ZAK, LLP

/s/ Yanxiong Li, Esq.

Yanxiong Li, Esq.

Nevada Bar No. 12807

7785 W. Sahara Ave., Suite 200

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*Attorneys for Plaintiff*

DATED this 25<sup>th</sup> day of March, 2024.

SINCLAIR BRAUN KARGER LLP

/s/ Kevin S. Sinclair, Esq.

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*Attorneys for Defendant*

**IT IS SO ORDERED.**

DATED: March 26, 2024

  
DISTRICT COURT JUDGE

<sup>1</sup> The other four cases being *Wells Fargo Bank, N.A. v. Commonwealth Land Title Insurance Company*, Case No. 2:19-cv-00803-GMN-EJY; *U.S. Bank National Association v. Fidelity National Title Group, Inc., et al*, Case No. 2:21-cv-01454-GMN-NJK; *Deutsche Bank National Trust Company v. Fidelity National Title Group, Inc., et al*, Case No. 2:20-cv-01886-GMN-BNW; *Wilmington Trust, National Association v. Commonwealth Land Title Insurance Company*, Case No. 2:18-cv-02023-GMN-BNW.